

**In the United States District Court
For the Southern District of Texas
Houston Division**

**Travelers Casualty and
Surety Company of America,
Plaintiff,**

v.

**PRCHOU, LLC, Mukadas D.
Kurban, Apar Pataer, Abdul R.
Dawood, and Maria E. Dawood
Defendants.**

Case No. 4:24-cv-00796

**Unopposed Motion for Enlargement of Time
Re: Motion for Summary Judgment of Plaintiff and Brief in Support (Dkt. No. 31)**

Defendants file this Unopposed Motion for Enlargement of Time Regarding Motion for Summary Judgment of Plaintiff and Brief in Support (Dkt. No. 31) to request that: 1) Defendants have a one-week extension until July 14, 2025 to file their response(s) to Plaintiff's motion for summary judgment (Dkt. No. 31) and 2) Plaintiff have a corresponding one-week extension until July 21, 2025 to file any reply(ies) in support of said motion for summary judgment (Dkt. No. 31).

This Motion is being sought so that the parties can focus their time and resources on concluding their serious, ongoing efforts to resolve this matter by mutual agreement. The requested enlargement of time will allow the parties the time needed to conclude these seemingly promising discussions - which, if successful, would obviate the need for the Court to even consider the subject motion for summary judgment (Dkt. No. 31).

Counsel for Plaintiff, Brandon Baines, stated that Plaintiff is unopposed to this Motion and the relief requested herein.

For the reasons stated above, Defendants respectfully request that the Court extend: a) Defendants' deadline to file any response(s) to Plaintiff's motion for summary judgment (Dkt. No. 31) to July 14, 2025 and b) Plaintiff's deadline to file any reply(ies) in support of its motion for summary judgment (Dkt. No. 31) to July 21, 2025. Defendants also request all other relief to which they are justly entitled.

Respectfully Submitted,

Meade Neese & Barr LLP

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**Attorneys Defendants
PRCHOU, LLC,
Mukadas D. Kurban, and
Apar Pataer**

Certificate of Conference

Counsel for Plaintiff indicated that he is unopposed to the relief requested herein.

/s/ D. John Neese, Jr.
D. John Neese, Jr.

Certificate of Service

I hereby certify that a true and correct copy of the foregoing document was served on all counsel of record by electronic service on July 7, 2025.

/s/ D. John Neese, Jr.
D. John Neese, Jr.